

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **BANKRUPTCY NO. 15-17116 (ELF)**
SHERA Y. SCOTT : **CHAPTER 13**
 :
Debtor : **HEARING SCHEDULED FOR**
 : **September 26, 2017 at 1:00 p.m.**
 : **UNITED STATES BANKRUPTCY COURT**
 : **900 MARKET STREET, SUITE 400**
 : **PHILADELPHIA, PENNSYLVANIA 19107**

DEBTOR'S MOTION TO MODIFY PLAN AFTER CONFIRMATION

1. Debtor filed her case on October 2, 2015 and this Court confirmed the case on May 24, 2016.

2. The Debtor has decided to make payments to Santander Bank outside the plan rather than pay the balance through the plan thus reducing her Trustee payment to succeed in her case.

3. Upon entry of the Court's Order allowing the modified plan the Debtor will file amended Schedules I and J to accurately reflect her current income and expenses.

4. A copy the Modified Plan is attached to this motion.

5. Modification of the plan is necessary to properly fund the plan so the plan can complete on time and so the Debtor may receive her discharge and fresh start.

WHEREFORE, Debtor prays this Honorable Court enter the attached Order Granting Debtor's Motion to Modify the Plan and Confirming Debtor's First Amended Plan filed Post-Confirmation.

DATED: August 25, 2017

By: /s/ Christopher J. Kern
Christopher J. Kern, Esquire
Attorneys for Debtor